Degradation half lives for	select chemic	als in soils	, sediment	s, and surfa	ace wate	rs*.					
	Half Life (days) Sediment/Soils						Half Life (days) Waters				
Chemical	Slow	Mid**	Fast	Matrix	Ref.	Slow	Mid**	Fast	Matrix	Ref.	
TributyItin	150	120	112	Sed	(10)	140	9.0	4.0	SW	(10)	
	160	15	2	Sed	(12)	150	11.0	2.5	SW	(12)	
	inf (1898)	374	113	Sed	(13)						
Bis(2-ethylhexyl)phthalate	389	-	5.0	Various	(3)	23	-	5.0	SW	(3)	
	495	187	63	Sed	(6)	inf (173)	20	5.3	SW	(6)	
	347	44	8.5	Soil	(6)	32	21	2.9	SW	(10)	
	inf (200)	31	14	Soil/Sed	(10)						
Benzo(a)pyrene	2120	644	57	Soil/GW	(3)	530	-	57	SW	(3)	
	inf (11,552)	315	12	Soil	(6)	431	-	207	SW	(3)	
	inf (2100)	330	85	Sed	(6)	inf.	-	462	SW	(6)	
	2993	269	2.1	Soil	(4)	-	825	-	SW	(4)	
	inf (2100)	741	54	Sed	(10)						
	inf (2993)	290	82	Soil	(10)						
Naphthalene	125	-	0.12	Soil	(4)	550	-	0.67	SW	(4)	
	219	-	0.20	Sed/GW	(4)	20	-	0.50	SW	(3)	
	258	25	1.0	Various	(3)	178	8.0	0.29	SW	(6)	
	72	17	0.21	Sed	(6)	43	9.0	2.9	SW	(10)	
	inf (99)	6.9	1.8	Soil	(6)						
	inf (3851)	130	2.3	GW/Soil	(11)						
	inf (18)	7.0	2.0	Soil	(10)						
	inf (88)	17	0.13	Sed/GW	(10)						
DDD	11,425	730	70	Soil/GW	(3)	5833	-	730	SW	(3)	
	5776	1005	730	Soil	(7)	-	10,193	-	SW	(7)	
	-	160	-	Soil	(10)	inf (69,350)	31,390	570	SW	(10)	
	-	inf	-	Sed	(10)						
DDT	11,425	730	16	Soil/GW	(3)	5833	350	7.0	SW	(3)	
	5776	2806	110	Soil	(7)	8060	347	7.0	SW	(7)	
	12,775	730	31	Soil	(10)	inf (54,750)	4380	81	SW	(10)	
PCBs***	inf (180,713)	20,440	50	Soil/Sed	various	inf (180,713)	20,440	50	SW	various	

^{*} In cases where very limited data are available groundwater, and/or marine degradation rates were also compiled. Anerobic and aerobic rates shown for sediment and aerobic rates shown for water, unless very limited data available.

NA - Not applicable

Sed - Sediment

SW - Fresh surface waters

GW - Groundwater

- Statistic not reported or addressed.

^{**}Mid - Central tendency estimate as reported (e.g., median, mean, mid-range), only value reported, or median calculated from multiple reports in reference.

^{***} A large number of PCB degradation rates exist that are for specific congeners or congener groups. This table provides an overall summary of the range of PCB degradation rates found. To refine these ranges, the specific congeners for modeling need to be selected.

inf. - slowest rate was no degradation reported (maximum measured half life reported in parenthesis).

REFERENCES

(3)	Howard, Philip H; Boethling, Robert S.; Meylan, William M.; Michalenko, Edward M. (1991) Handbook of Environmental
	Degradation Rates. Lewis Publishers for CRC Press, Inc., Boca Raton, Florida.
(4)	Mackay, Donald; Shiu, Wan Ying; Ma, Kuo Ching. (1992) Illustrated Handbook of Physical-Chemical Properties and
	Environmental Fate for Organic Chemicals. Vol II, Polynuclear Aromatic Hydrocarbons, Polychlorinated Dioxins, and

Dibenzofurans. Lewis Publishers, CRC Press L.L.C., Boca Raton, Florida

(6) Aronson, D et al., (1999) Aerobic Biodegradation of Organic Chemicals in Enviornmental Media: A Summary of Field and

Laboratory studies. Prepared for the U.S. Environmental Protection Agency, Athens GA

(7) Leatherbarrow, JE et al. (2006); Organochlorine Pesticide Fate in San Francisco Bay

(10) Hazardous Substances Data Bank (HSDB). http://toxnet.nlm.nih.gov/cgi-bin/sis/htmlgen?HSDB

(11) Aronson, D. and P.H. Howard. (1997) Anaerobic Biodegradation of Organic Chemicals in Groundwater, A Summary of Field

and Laboratory Studies. Environmental Science Center, Syracuse Research Corporation. North Syracuse, New York.

(12) Champ, M.A. and P.F. Seligman. (1996) Organotin, Environmental Fate and Effects. Chapman and Hall Publishing. New York.

(13) Dowson, P.H., J.M. Bubb, J.N. Lester. (1996) Persistence and Degradation Pathways of Tributyltin in Freshwater and

Estuarine Sediments. Estuarine and Coastal Shelf Science. 42:551-562

Various PCB References

Mackay, Donald; Shiu, Wan Ying; Ma, Kuo Ching. (1992) *Illustrated Handbook of Physical-Chemical Properties and Environmental Fate for Organic Chemicals. Vol 1, Monoaromatic hydrocarbons, chlorobenzenes and PCBs*. Lewis Publishers, CRC Press L.L.C., Boca Raton, Florida

Hutzinger, O., Safe, S., Zitko, V. (1974) The Chemistry of PCBs. CRC Press, Inc., Cleveland, Ohio

Howard, Philip H; Boethling, Robert S.; Meylan, William M.; Michalenko, Edward M. (1991) *Handbook of Environmental Degradation Rates*. Lewis Publishers for CRC Press, Inc., Boca Raton, Florida.

Davis, Jay A.; (2004), The Long-term Fate of Polychlorinated Biphenyls in San Francisco Bay (USA), Environmental Toxicology and Chemistry, Vol 23, No. 10, pp. 2396-2409

Beurskens, J. E. M. and P. B. M. Stortelder, 1995. Microbial transformation of PCBs in sediments: what can we learn to solve practical problems? Water Science Technology, 8, 99-107.

Fish, K. M., 1997. The Influence of Temperature on the Biotransformations of Aroclor 1242 in Hudson River Test Tube Microcosms. From GE Research and Development Center, Technical Information Series, 97CRD035. April.

Hollifield, M. B., J. K. Park, W. C. Boyle, P. R. Fritschel, 1995. Factors influencing the development of a biostimulant for the in-situ aerobic dechlorination of polychlorinated biphenyls in Fox river, Wisconsin sediments. In Dredging, Remediation, and Containment of Contaminated Sediments, ASTM STP 1293. Editors K. R. Demars, G. N. Richardson, R. N. Yong, R. C. Chaney.

Lake, J. L., R. J. Pruell, F. A. Osterman, 1991. Dechlorinations of polychlorinated biphenyls in sediments of New Bedford Harbor. In USEPA/600/D-91/249.

Van Dort, H. M., L. A. Smullen, R. J. May, D. L. Bedard, 1997. Priming microbial meta-dechlorination of polychlorinated biphenyls that have persisted in Housatonic River sediments for decades. Environmental Science and Technology, 31, 3300-3307.

EPA Comments on Proposed Chemical Degradation Rates:

Introduction:

Chemical degradation rates are a key component of the contaminant fate and transport model for the Portland Harbor site. Further, sediment half-life has been identified as a sensitive parameter in the hybrid model report. In the hybrid model report, sediment half-life was used as a calibration parameter. However, EPA did not believe that the calibration data set was sufficient to calibrate the model and instead proposed a model testing approach. For the model testing approach, EPA recommended evaluating the literature to select initial sediment half-life values, running the model, evaluating model performance and adjusting the sediment half-life as necessary.

On July 24, 2008, the Lower Willamette Group submitted a table of chemical degradation rates for fate and transport modeling. EPA agreed to review the rate ranges and select several increments that LWG should use in the model testing phase.

Comments:

The chemicals presented in the table shown here are consistent with the agreed upon list of chemicals for fate and transport modeling. EPA acknowledges that specific PCB congeners for modeling need to be selected. EPA expects that the determination of which PCB congeners will be modeled will be determined in conjunction with our discussions of which congeners will be selected for PRG development.

For most of the chemicals of concern (COCs), EPA recommends using the slow or midrange half lives presented in the table. The values presented are generally conservative and match values readily available in on-line search engines such as the PBT Profiler (www.pbtprofiler.net) and the HSDB (http://toxnet.nlm.nih.gov/cgi-bin/sis/htmlgen?HSDB). The latter database was included in the references to the table of half lives. However, for some chemicals, selection of a half life is problematic. For example, many PCB congeners do not degrade all the way to non-toxic daughter products, so a fraction of the PCBs may ultimately disappear, but the remainder persists indefinitely. The same is true of DDT and DDD as well which typically degrade to DDMU and stop. In general, literature-based degradation rates are estimated based on the disappearance rates of the starting chemical and are typically not mineralization rates. As a result, sediment half-lives should approach infinity for DDD, DDT and PCBs. In summary EPA recommends using a half-life of 10¹⁰ for PCBs, DDD and DDT and use the largest or mid-range half lives for the other chemicals.

Responses to EPA Comments on Proposed Degradation Rates

EPA provided comments to LWG on September 23, 2008 on Proposed Degradation Rates that were presented in an Excel table submitted to EPA on July 24, 2008. This document contains responses to EPA's comments.

Comment 1:

Introduction: Chemical degradation rates are a key component of the contaminant fate and transport model for the Portland Harbor site. Further, sediment half-life has been identified as a sensitive parameter in the hybrid model report. In the hybrid model report, sediment half-life was used as a calibration parameter. However, EPA did not believe that the calibration data set was sufficient to calibrate the model and instead proposed a model testing approach. For the model testing approach, EPA recommended evaluating the literature to select initial sediment half-life values, running the model, evaluating model performance and adjusting the sediment half-life as necessary.

On July 24, 2008, the Lower Willamette Group submitted a table of chemical degradation rates for fate and transport modeling. EPA agreed to review the rate ranges and select several increments that LWG should use in the model testing phase.

Response: We agree the comment accurately reflects the history of this issue.

Comment 2: The chemicals presented in the table shown here are consistent with the agreed upon list of chemicals for fate and transport modeling. EPA acknowledges that specific PCB congeners for modeling need to be selected. EPA expects that the determination of which PCB congeners will be modeled will be determined in conjunction with our discussions of which congeners will be selected for PRG development.

Response: LWG's proposal for modeling PCB congeners is described in the LWG memo *Responses to EPA's Comments on Appendix E of the Comprehensive Round 2 Site Characterization Summary and Data Gaps Report (dated August 8, 2008)* submitted to EPA on October 3, 2008. It states: "In addition, the LWG is proceeding with AFT modeling (and eventually dynamic FWM modeling) for PCB 126 and 77. These congeners were selected for AFT modeling because, based on a review of the Portland Harbor BLRA tissue concentration data, they are the greatest contributors to potential PCB TEQ risks in mammals (human and wildlife) and birds, respectively."

Comment 3: For most of the chemicals of concern (COCs), EPA recommends using the slow or mid-range half lives presented in the table. The values presented are generally conservative and match values readily available in on-line search engines such as the PBT Profiler (www.pbtprofiler.net) and the HSDB (http://toxnet.nlm.nih.gov/cgi-bin/sis/htmlgen?HSDB). The latter database was included in the references to the table of half lives.

Response: The LWG agrees to use the slow and mid-range half lives in the table in the model testing.

Comment 4: However, for some chemicals, selection of a half life is problematic. For example, many PCB congeners do not degrade all the way to non-toxic daughter products, so a fraction of the PCBs may ultimately disappear, but the remainder persists indefinitely. The same is true of DDT and DDD as well which typically degrade to DDMU and stop. In general, literature-based degradation rates are estimated based on the disappearance rates of the starting chemical and are typically not mineralization rates.

Response: The LWG disagrees with EPA's statements that some compounds do not degrade all the way to non-toxic daughter products and that DDT and DDD typically degrade to DDMU and stop. The idea of so-called non-toxic daughter compounds is contrary to the fundamentals of toxicology in which all substances are toxic and the dose makes the poison. In some cases, degradation can result in transformation and bioactivation of daughter compounds that are more toxic than the parent compound. More often, degradation occurs by mechanisms that reduce but don't eliminate toxicity of intermediate products. Hence, all compound groups most likely yield intermediate products with some level of toxicity, which are likely to be present until the parent compound is completely degraded. Also, DDMU is not a terminal product in degradation of DDT and DDD. There are many other intermediate degradation products. Also, depending on site conditions, DDT and DDD may be completely degraded over time (see references provided at end of responses).

However, LWG intends to use a range of very slow degradation rates as described in the next response.

Comment 5: As a result, sediment half-lives should approach infinity for DDD, DDT and PCBs. In summary EPA recommends using a half-life of 10¹⁰ for PCBs, DDD and DDT and use the largest or mid-range half lives for the other chemicals.

Response: LWG sought clarification on this issue and the email questions and responses below present our understanding of the agreed path forward.

<u>From Carl Stivers (LWG): Chip</u> - Thanks for the email on the degradation rates. I want to make sure I've got the EPA direction correctly. We will use the mid and slow range values for all chemicals (except those noted below) for model testing purposes.

For the exceptions, DDD, DDT, and PCBs, we will use rates on the order of 10^10 days. My main question is that we discussed using a range for model testing. What do we do if 10^10 does not test out well for these chemicals? Should we just stop there and consult EPA, or are we allowed to try out something similar to the slow ranges shown in our table.

This latter course of action would seem to make more sense to me to make our check in meeting to discuss model testing more useful. All first runs of model results will be considered for discussion purposes only in any case.

Please confirm your understanding. Thanks.

<u>From Chip Humphrey:</u> Carl - I agree with the approach (trying other values if 10¹⁰ doesn't work) but am concerned about jumping to the table values for DDT and DDD unless the model will account for breakdown to other toxic compounds.

<u>From Carl Stivers:</u> Chip - Thanks for the reply. We don't have to jump all the way up to the table values for DDT and DDD, we can try increments slower than those. I just did not want to be locked into only one value, which kind of defeats the purpose of the exercise.

From Chip Humphrey: Sounds workable to me.

REFERENCES

Alvarez, P.J.J., and W.A. Illman. 2006. Bioremediation and Natural Attenuation: process fundamentals and mathematical models. First Edition. John Wiley & Sons, Inc., Hoboken, NJ. 609 pp.

Aislabie, J.M., N.K. Richards, and H.L. Boul. 1997. Microbial degradation of DDT and its residues—a review. New Zeal. J. Agr. 40:269-282.

Bennet, J.W., K.G. Wunch, and B.D. Faison. 2002. Manual of Environmental Microbiology. Second Edition. ASM Press, Washington, DC. pp. 960-971.

Eganhouse R. and J. Pontolillo. 2008. DDE in Sediments of the Palos Verdes Shelf, California: In Situ Transformation Rates and Geochemical Fate. Environ. Sci. Technol. 2008, 42, 6392–6398; and)

Nortstrom, R.J. 2002. Understanding bioaccumulation of POPs in food webs: chemical, biological, ecological and environmental considerations. Environ. Sci. Pollut. R. 9:300 303.

Tanabe, S., H. Tanaka, and R. Tasukawa. 1984. Polychobiphenyls, ΣDDT, and hexachlorocyclohexane isomers in the western north Pacific ecosystem. Arch. Environ. Contam. Toxicol. 13:731-738.

Carl Stivers

From: Humphrey.Chip@epamail.epa.gov
Sent: Friday, September 26, 2008 1:07 PM

To: Carl Stivers

Subject: RE: Degradation Rates

Sounds workable to me.

"Carl Stivers" <cstivers@anchor env.com>

env.com> To Chip Humphrey/R10/USEPA/US@EPA

09/26/2008 11:40

/20/2000 11.40

AM

Subject

RE: Degradation Rates

Chip - Thanks for the reply. We don't have to jump all the way up to the table values for DDT and DDD, we can try increments slower than those. I just did not want to be locked into only one value, which kind of defeats the purpose of the exercise.

Thanks.

Carl

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----Original Message----

From: Humphrey.Chip@epamail.epa.gov [mailto:Humphrey.Chip@epamail.epa.gov] Sent: Wednesday, September 24, 2008 4:29 PM

To: Carl Stivers

Subject: Re: Degradation Rates

Carl - I agree with the approach (trying other values if 10^10 doesn't work) but am concerned about jumping to the table values for DDT and DDD unless the model will account for breakdown to other toxic compounds.

"Carl Stivers" <cstivers@anchor</pre>

env.com>

Chip Humphrey/R10/USEPA/US@EPA CC

09/24/2008 08:12 ΜA

Subject

To

Degradation Rates

Chip - Thanks for the email on the degradation rates. I want to make sure I've got the EPA direction correctly. We will use the mid and slow range values for all chemicals (except those noted below) for model testing purposes.

For the exceptions, DDD, DDT, and PCBs, we will use rates on the order of 10^10 days. My main question is that we discussed using a range for model testing. What do we do if 10^ 10 does not test out well for these chemicals? Should we just stop there and consult EPA, or are we allowed to try out something similar to the slow ranges shown in our table. This latter course of action would seem to make more sense to me to make our check in meeting to discuss model testing more useful. All first runs of model results will be considered for discussion purposes only in any case.

Please confirm your understanding. Thanks.

Carl

Carl Stivers cstivers@anchorenv.com

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